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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

AMELIA EUCEDA
as an individual Successor in interest to
Jesus Noe Maldonado, decedent,
Plaintiff,

v.

PELICAN BAY STATE PRISON,
RICHARD KIRKLAND, WARDEN AND
MAUREEN McCLEAN ,
Defendants.

C 06-1411 PJH

**STIPULATION TO CONTINUE
DISCOVERY CUTOFF DATES**

Judge: The Honorable Phyllis J. Hamilton

THE PARTIES THROUGH THEIR UNDERSIGNED COUNSEL, STIPULATE AND
AGREE AS FOLLOWS:

Trial in this matter is currently scheduled to begin on October 22, 2007, and the court
ordered that the parties disclose experts on February 15, 2007. The expert discovery cutoff was
set for March 19, 2007, and the non-expert discovery cutoff was set for March 19, 2007.

1 The parties have agreed to continue the above referenced discovery dates for thirty-five
2 days in order to allow the parties additional time to evaluate their cases and explore the
3 possibility of a settlement agreement or dispositive motions;

4 THEREFORE, IT IS HEREBY STIPULATED AND AGREED THAT:

5 (1) A continuance of the deadlines for non-expert discovery, expert disclosure, and
6 depositions of expert witnesses is in the best interests of the parties;

7 (2) Subject to further agreement by the parties or order of this Court, the date for
8 disclosure of expert witnesses is continued until March 23, 2007, followed by mutually
9 agreeable deposition dates. Additionally, the expert discovery cutoff and the non-expert
10 discovery cutoff dates are continued until April 23, 2007.

11 Dated: February 15, 2007

12 EDMUND G. BROWN JR.
13 Attorney General of the State of California

14 By: /s/ Virginia I. Papan
15 VIRGINIA I. PAPAN
16 Deputy Attorney General
17 Attorneys for Defendants
18 Maureen McLean and Richard Kirkland

18 Dated: February 15, 2007

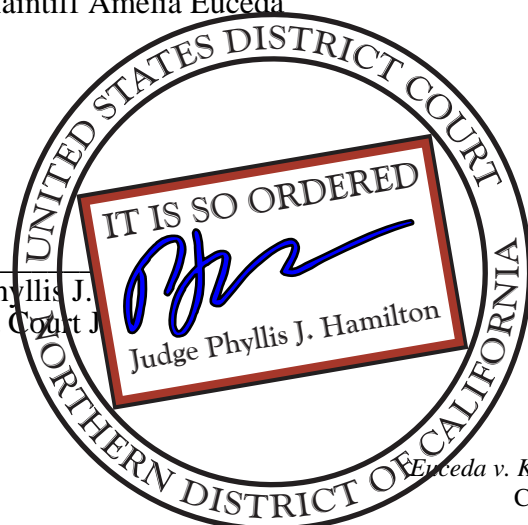
19 LAW OFFICE OF JERRY D. ROTHMAN
20 Jerry D. Rothman

21 By: /s/ Jerry D. Rothman
22 JERRY D. ROTHMAN
23 Attorney for Plaintiff Amelia Euceda

24 IT IS SO ORDERED.

25 Dated: 2/16/07
26 _____

27 Hon. Phyllis J.
28 District Court J



Stipulation to Continue Discovery Cutoffs

Euceda v. Kirkland, et al.
C 06-1411 PJH